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Lead Counsel for Plaintiffs and the Class

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

In re EFFEXOR XR ANTITRUST
LITIGATION

This Document Relates To:

All Indirect Purchaser Class Actions

NOTICE OF UNOPPOSED MOTION

Civil Action No. 3:11-cv-05661 (ZNQ)(JBD)

Master Docket No. 3:11-cv-05479

(ZNQ)(JBD)

To: All Persons on ECF Service List

PLEASE TAKE NOTICE that at such date and time as the Court shall determine, Indirect Purchaser Plaintiffs, through their undersigned counsel, shall move, on behalf of Indirect Purchaser Plaintiffs and the proposed Indirect Purchaser Class, before the Honorable Zahid N. Quraishi, U.S.D.J. at the United States District Court, District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Court Room 4W, Trenton, NJ 08608, for entry of the proposed preliminary approval Order that, among other things, will, (1) preliminarily approve the proposed Settlement; (2) certify the proposed Settlement Class, appoint Indirect Purchaser Plaintiffs as Class representatives, and appoint Class Counsel for purposes of the Settlement; (3) approve the form and manner of giving notice of the proposed Settlement to the Settlement Class

Members; (4) schedule a hearing to consider final approval of the Settlement; and (5) grant such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, in support of the motion, Class Counsel will rely upon the accompanying brief in support and the Declaration of James E. Cecchi and exhibits annexed thereto.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Federal Rules of Civil Procedure, a proposed form of Order is attached.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby requests oral argument.

Dated: March 17 2025

**CARELLA, BYRNE, CECCHI,
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s/ James E. Cecchi

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